

Message

From: Beslow, Mike [beslow.mike@epa.gov]
Sent: 5/24/2017 7:30:39 PM
To: Dixit, Naeha [dixit.naeha@epa.gov]
Subject: FW: Outfalls 001 and 009/010 Investigative Workplans
Attachments: 042417 AM IH CWTP 001 preliminary work plan outline - EPA.pdf; 051117 IH West Outfalls 009 010 draft work plan outline - Coast Guard.pdf

Flag: Follow up

From: Barnett, Thomas R [mailto:Thomas.Barnett@arcelormittal.com]
Sent: Wednesday, May 24, 2017 1:47 PM
To: Arnold, Paul S LT <Paul.S.Arnold2@uscg.mil>; Fitzgerald, Sean F MST1 <Sean.F.Fitzgerald@uscg.mil>; Beslow, Mike <beslow.mike@epa.gov>
Cc: Doyle, Kevin <Kevin.Doyle@arcelormittal.com>
Subject: Outfalls 001 and 009/010 Investigative Workplans

Gentlemen:

The purpose of this e-mail is to follow-up on our proposed work plan outlines to address oil sheen issues at Outfall 009 & 010 at Indiana Harbor West and Outfall 001 at Indiana Harbor Central Wastewater Treatment Plant. Officer Arnold of the Coast Guard responded to us today (5/24/17). We appreciate the Coast Guard comments and will incorporate same into our work plan.

In response to requests from EPA and the Coast Guard for more comprehensive studies at Outfall 001 and Outfall 009 & 010 with the objective of resolving the oil sheen issues, we enlisted third party engineering, field services and analytical services companies. We submitted draft work plan outlines for Outfall 001 at IH CWTP to EPA on April 24, 2017, and for Outfalls 009 & 010 at IH West to the Coast Guard on May 11, 2017 (copies of each are attached for your convenience). In addition we responded to Mike's e-mails of May 1, 2017 and May 9, 2017 regarding Outfall 001 by our e-mails of May 8, 2017 and May 11, 2017. Reference is made to our e-mails for the current status as of those dates and for actions we are taking to address the Outfall 001 issue.

At this time, we believe we have addressed issues at Outfalls 009 and 010 with the rerouting of the seven sumps in the powerhouse area to the Terminal Lagoon, and away from Outfalls 009 and 010. Nonetheless, we are planning on initiating the study recently submitted, with the U.S.C.G comments incorporated, in order to confirm there are no facility sources of sheen to these Outfalls. At Outfall 001, with the rebuild of the two clarifiers, we have taken the appropriate actions to eliminate visible oil from the Central Treatment Plant. Currently, we are working with United States Steel (USS) to determine any sources of oil that may be present in the cooling water/storm water sewer that discharges directly to Outfall 001 from the Tin Mill. The proposed 001 investigation will enable us to better identify the source/sources of oil at the 001 Outfall structure. Meanwhile, we continue to engage Kenny Manta Industrial Services seven days a week to collect any oil sheen that appears in this structure.

As noted in our e-mail of May 9th, to avoid further delay we initiated part of our proposed work plan for Outfall 001 during the week of May 15th. Samples are undergoing analyses as described in the proposed Outfall 001 work plan outline. We expect to report results of that preliminary sampling within the next few weeks. Those results will inform our further work at Outfall 001.

Following your advice, we have filed a Freedom of Information Act (FOIA) request to obtain copies of sampling and analytical reports for EPA and Coast Guard samples collected with respect to the Outfall 009 & 010 and Outfall 001 oil sheen issues. We want to also explore possible supplemental analyses of retained extracts for those samples as part of our overall work plans and investigations.

To date we have not received any comments from EPA in regards to our Outfall 001 work plan outline. We again extend the offer of a meeting with either, or both Agencies to review our proposed work plan outlines. We value input from EPA and the Coast Guard and we want to ensure the final work plans are responsive to your requests for supplemental investigations as to possible sources of visible oil.

We are available Tuesday and Wednesday of next week (May 30 and 31, 2017) to discuss the Coast Guard recommendations, and to discuss any comments EPA may have. At that meeting we will be prepared to address the technical comments from the Coast Guard and review the qualifications of the firms we are using for this work. Please advise if you would like to schedule a meeting. In the event the agencies decide not to participate, we will proceed with developing final work plans based on the USCG comments on the 009/010 outline, and our original 001 outline. We will provide copies of both work plans to EPA and the Coast Guard for review. This effort will take several weeks.

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